

IN THE UNITED STATES DISTRICT COURT FOR
MIDDLE DISTRICT OF PENNSYLVANIA

No. 1:CV-00-1714

JOSEPH M. CRAVIERO JR.

V.

UNITED STATES OF AMERICA, et al.

FILED
HARRISBURG

MAR 12 2001

MARY E. D'ANDREA, CLERK
Per 9/18
DEPUTY CLERK

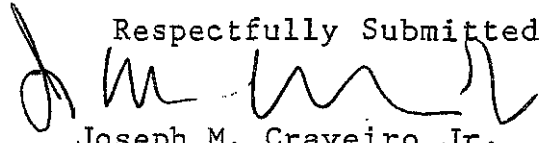
MOTION TO COMPEL

NOW comes the above named Petitioner who Respectfully requests this Honorable Court to Issue an Order to the named herein Attorney, to answer Petitioner's First of Interrogatories in accordance to the F.R.C.P. Rule 33, and States the following :

- 1.) The Petitioner, on 01/15/01 Served a Copy of his Interrogatories on Attorney Robert J. Consentino, via U.S. Mail, and gave him 30 days to answer said interrogatories.
- 2.) It has now been some 38 days since this request to the above named Counsel and his failure to respond.

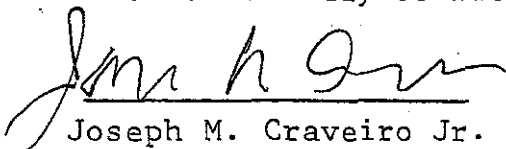
WHEREFORE the above named Petitioner Respectfully requests this Hon. Court to Grant this Order/Motion Compelling the named Herein Atty; to provide an answer to the Petitioner's First set of Interrogatories.

Respectfully Submitted


Joseph M. Craveiro Jr.

CERTIFICATE OF SERVICE

I, Joseph M. Craveiro Jr. hereby states that I have served a true Copy of the Forgoing Motion to Compel to the above named Respondent(and Attorney Robert J. Consentino , located at
On this 8th. day of March, in the year of our Lord 2001.


Joseph M. Craveiro Jr.

3/8/01

IN THE UNITED STATES DISTRICT COURT FOR
MIDDLE DISTRICT OF PENNSYLVANIA

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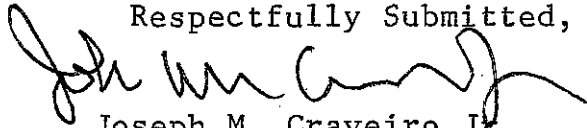
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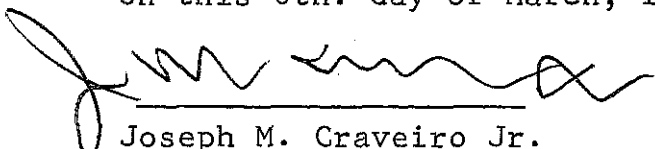
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Joseph M. Craveiro Jr.

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On this 8th. day of March, in the year of our Lord 2001.


Joseph M. Craveiro Jr.

3/8/01

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MIDDLE DISTRICT OF PENNSYLVANIA

No. 1:CV-00-1714

JOSEPH M. CRAVEIRO JR.

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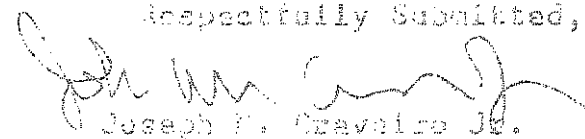
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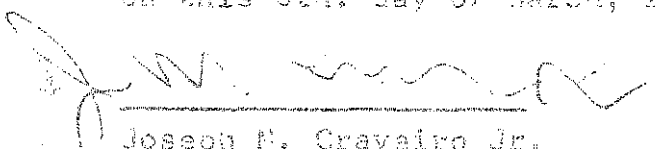
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Respectfully Submitted,


Joseph M. Craveiro Jr.

CERTIFICATE OF SERVICE

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On this 8th. day of March, in the year of our Lord 2001.


Joseph M. Craveiro Jr.

3/8/01

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

JOSEPH M. CRAVEIRO Jr.,
Petitioner

C.V. No. 1:00-00-1714

v.

SUSAN GERLINSKI, WARDEN L.S.C.I. ALLENWOOD
ET AL., RESPONDENT(S)

PETITIONERS FIRST OF INTERROGATORIES

Pursuant to Provisions of Rule 33 F.C.R.P., you are hereby requested to answer, in writing, and Under Oath within 30 days herein of the following Interrogatories:

- 1.) Please state in full, your name, what you do for employment, and employed by whom.
- 2.) Please state, at any time after you were Appointed to Case No. 97-2769, did you talk with the Petitioner via phone, or in writing?
- 3.) If yes to question (2) two, please state what your conversation was about.
- 4.) Please state if in fact the named herein Petitioner requested you to only have heard the pending Motion(s) before the Court.
- 5.) If your Answer to question (4) four is yes, Please state when you took it the initiative to file a Motion to Expand the Record.
- 6.) If in fact you did object to the Ruling of the In-chamber hearing by the Judge, why was this not on the Record?
- 7.) Is it common practice to discuss your Case with the State Attorney, or Merits of said Case?
- 8.) As an Attorney in the State of Rhode Island, is it not Common practice for a Lawyer to Plea a Defendant to a NOLO CONTENDERE ?
- 9.) If your answer to question (8) eight is yes, can this Plea be used in Admission in the future elsewhere ?
- 10.) Is it common practice for Rhode Island Judges to give a Plea Colloquy at time of sentencing ?

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

C.V. No.1:00-00-1714

Petitioners First of Interrogatories
Continued; Page (2):

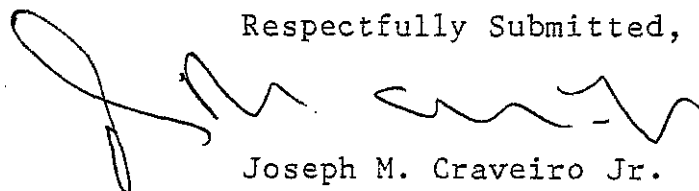
11.) Do you know at any other previous time at sentencing while you were representing a Client, that the Judge did not give a Plea Colloquy ?

12.) If your Answer to question (11) eleven is yes, Please state if this is common, or uncommon in the State of Rhode Island.

13.) Do you believe that when the Judge , at the In-Chamber hearing Denied the Motion(s), was it your job to object and then Appeal that Ruling to the State Supreme Court ?

14. Do you know of any other way you could have had the Petitioners Case heard by the Court in where he might have had a Chance for an Appeal on the Issues before the Court that he raised in his Rule 60 (b) Motion ?

Respectfully Submitted,



Joseph M. Craveiro Jr.

02630-070

L.S.C.I. Allenwood

P.O. Box 1000

White Deer, PA. 17887

Dated: 01/15/01

CERTIFICATE OF SERVICE

I hereby certify that I have mailed a True copy of the forgoing Motion of: First of Interrogatories, via U.S. Mail , to Attorney Mr. Robert J. Consentino, 950 Smith street, Providence, R.I. 02908, on this 15th. day of January, in the year of our Lord 2001.

